

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

RAKEEM CHANEY #770493,

Plaintiff,

NO. 1:18-cv-1065

v

HON. JANET T. NEFF

TONY BREEDLOVE and
ERIC HUDSON,

MAG. SALLY J.

Defendants.

BERENS

Keith L. Altman (P81702)
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**MOTION TO CONTINUE MAY 12, 2021 SETTLEMENT CONFERENCE
& RELATED DEADLINES**

Plaintiff Rakeem Chaney files this motion for an extension of certain deadlines and resetting the Settlement Conference set by this March 24, 2021 Amended Scheduling Notice and in support thereof states as follows:

Plaintiff's counsel has recently changed. See Former Counsel Solomon M. Radner's Motion to Withdraw as Counsel for Plaintiff filed 02/03/21. The Law Office of Keith Altman began representation of Plaintiff on March 18, 2021.

Plaintiff is a prisoner incarcerated with the Michigan Department of Corrections (MDOC). Due to COVID-19 pandemic-related visitation restrictions, Plaintiff has been unable to meet freely with counsel to discuss this matter, including discussing its potential resolution. Combined with the recent change of Counsel, Plaintiff has been unable to comply with the Court's directive of providing a settlement demand by April 28, 2021.

Plaintiff's counsel has conferred with Defendant's counsel, who does not oppose this request. This request is made in good faith and not for the purposes of unreasonable delaying these proceedings.

WHEREFORE, Plaintiff requests that the Court enter an Order: (i) continuing the May 12, 2021 Settlement Conference for a period no greater than 60 days and (ii) granting such other relief as the Court deems just and proper.

Respectfully submitted,

Dated: May 7, 2021

/s/ Keith Altman
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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2021, I served the foregoing document on Defendants *via* electronic filing:

/s/ Keith Altman

Keith L. Altman
Attorney for Plaintiff